



SHERWIN-WILLIAMS.

THE SHERWIN-WILLIAMS COMPANY
Environmental, Health & Regulatory Services
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Cleveland, Ohio 44115-1075
Facsimile: (216) 566-2730

November 2, 2006

Mr. Raymond Klimcsak
United States Environmental Protection Agency
Region 2
280 Broadway, 19th Floor
New York, NY 10007-1866

**RE: Response to EPA Letter dated September 20, 2006
Sherwin-Williams Gibbsboro Sites, Evaluation of Strategic Sampling Results,
Vacant Lot and Associated Reaches of White Sands Branch**

Dear Mr. Klimcsak:

The Sherwin-Williams Company (Sherwin-Williams) has received the U.S. Environmental Protection Agency (EPA) September 20, 2006 letter referenced above and is providing a response. Overall, we are in agreement with EPA's comments and suggestions.

Sherwin-Williams is providing a point-by-point response to expedite your review, and has included the text from EPA's letter, which is depicted in italics. Sherwin-Williams is using the same format for its response to the attached New Jersey Department of Environmental Protection (NJDEP) comments.

The U.S. Environmental Protection Agency (EPA) has completed its review of the May 30, 2006, Evaluation of Strategic Sampling Results, Vacant Lot and Associated Reaches of White Sands Branch submitted by the Sherwin-Williams Company (SWC) and offers the following comments. In addition, the New Jersey Department of Environmental Protection Agency (NJDEP) has provided comments on the May 30, 2006 document as well, these comments are attached (Attachment).

General Comments

- 1) *EPA approves the proposed changes to the list of Contaminants of Potential Concern (COPCs) for soil and sediment sample collection presented in the May 30, 2006, Evaluation of Strategic Sampling Results, Vacant Lot and associated reaches of White Sands Branch. This evaluation was based on EPA's review of the 2005 RI*



soil data (generated from sediment samples collected within the Vacant Lot and along the adjacent White Sands Branch transects) and sediment data (generated from sediment samples collected within White Sands Branch).

Sherwin-Williams acknowledges the above-referenced comment and will implement the proposed changes to the list of Contaminants of Potential Concern (COPCs). The analytical results for all additional samples will be limited to TAL metals.

In addition the EPA approves the proposed sediment sampling depths for the further vertical delineation samples and requests (as noted on Page 5 of the above mentioned May 30 document) that the depths of the soil and sediment samples to be collected along the third (proposed) transect, be consistent with the Agency's requirements for the additional characterization of Hilliard Creek.

Sherwin-Williams acknowledges the above-referenced comment and will implement the proposed changes to sampling depths for further vertical delineation samples and for samples collected along White Sand Branch transect WST-10.

Soil samples will be collected at 0.0 -0.5' and 2.0 - 2.5' and sediment samples will be collected from 0.0 - 0.5' and 2.5 – 3.0' consistent with the Agency's requirements for the additional characterization of Hilliard Creek. Samples will be screened and selected for laboratory analysis in accordance with the XRF Screening Protocol (submitted under separate cover).

- 2) *EPA (at this time) does not agree with the statement made about the lack of VOCs in groundwater beneath the adjacent Rt. 561 Dump Site. EPA will review the additional information which was requested in EPA's, August 7, 2006 comment memo on the SWC's May 23, 2006 Evaluation of Strategic Sampling Results, Route 561 Dump Site. In addition, EPA may request additional "deep" groundwater monitoring wells, than the one proposed in the May 23, 2006 proposal.*

Sherwin-Williams notes the above-referenced comment and awaits additional comments based upon the EPA's review of additional documentation.

Sediment Comments

As noted above, EPA concurs with the depth intervals (2.5 – 3.0') and locations (WSDD0016 and WSDD-0019) proposed for further vertical delineation sampling along White Sands Branch within the Vacant Lot vicinity. This is based on the assumption that the XRF field screening tool will also be used to generate screening data for possible field decisions.

Sherwin-Williams acknowledges the above-referenced comment and will collect additional vertical delineation samples at the following sediment locations:

- Sample location WSDD0016; and
- Sample location WSDD0019 (referenced above as *WSDD-0019*).

Sherwin-Williams will screen these locations in accordance with the XRF Screening Protocol, collect sediment samples at 2.5 – 3.0' and analyze them for the revised COPCs (TAL metals only) as approved by EPA. Additional vertical delineation samples will be screened and selected for laboratory analysis in accordance with the XRF Screening Protocol. The proposed sample locations are highlighted on revised Figure 5 (enclosed).

Soil Sampling

1. *EPA is requesting that the following Vacant Lot soil sample locations be further delineated vertically: VLSB0021, VLSB0027, and VLSB0028. VLSB0021 and VLSB0027 both had exceedances for metals and were only sampled to 0 -0.5'. VLSB0028 has been proposed due to the fact that culvert sample (sediment) WSDD0026 had exceedances for metals; however, transect (soil) samples were not collected due to the fact that it was proposed as a "culvert." Sampling VLSB0028 further vertically will provide confidence that contamination does not exist south of this location.*

Sherwin-Williams acknowledges the above-referenced comment and will collect additional vertical delineation samples at the following soil locations:

- Sample location VLSB0021;
- Sample location VLSB0027; and
- Sample location VLSB0028.

Sherwin-Williams will screen these locations in accordance with the XRF Screening Protocol, collect soil samples at 2.0 – 2.5' and analyze them for the revised COPCs (TAL metals only) as approved by EPA. Additional vertical delineation samples will be screened and selected for laboratory analysis in accordance with the XRF Screening Protocol. The proposed sample locations are highlighted on revised Figure 5 (enclosed).

2. *EPA is requesting that the following White Sands Branch soil sample locations be further delineated vertically: WSSB0004, WSSB0005, WSSB0007 and WSSB0008. WSSB0005 and WSSB0008 both had exceedances for metals at the 0-0.5'; however, samples were not collected and analyzed below this depth. Samples WSSB0004 and WSSB0007 are proposed to confirm the southern extent of contamination.*

Sherwin-Williams acknowledges the above-referenced comment and will collect additional vertical delineation samples at the following sampling locations:

- Sample location WSSB0004;
- Sample location WSSB0005;
- Sample location WSSB0007; and
- Sample location WSSB0008.

Sherwin-Williams will screen these locations in accordance with the XRF Screening Protocol, collect soil samples at 2.0 – 2.5' and analyze them for the revised COPCs (TAL metals only) as approved by EPA. Additional vertical delineation samples will be screened and selected for laboratory analysis in accordance with the XRF Screening Protocol. The proposed sample locations are highlighted on revised Figure 5 (enclosed).

NJDEP Comments

The New Jersey Department of Environmental Protection (NJDEP) is in receipt of the above noted document and has completed its review. The only comment the NJDEP has for this document is that the soil sample data presented in the submittal is limited to surface soils. In addition to the proposed additional vertical delineation of sediment contamination, Sherwin Williams is required to complete vertical delineation of metals contaminated soil detected at sample location VLSB0021 and WSSB0011 on the north side of the White Sand Branch.

Please incorporate this comment into the letter that the USEPA is sending to Sherwin-Williams with regard to the submitted proposal.

Sherwin-Williams acknowledges the above-referenced comment and will collect additional vertical delineation samples at the following sampling locations:

- Sample location VLSB0021 (this sample location is also addressed in EPA comments above); and
- Sample location WSSB0011.

Sherwin-Williams will screen these locations in accordance with the XRF Screening Protocol, collect soil samples at 2.0 – 2.5' and analyze them for the revised COPCs (TAL metals only) as approved by EPA. Additional vertical delineation samples will be screened and selected for laboratory analysis in accordance with the XRF Screening Protocol. The proposed sample locations are highlighted on revised Figure 5 (enclosed).

Should you have any questions or comments, please do not hesitate to contact me at 216-566-1794 or via e-mail at mlcapichioni@sherwin.com.

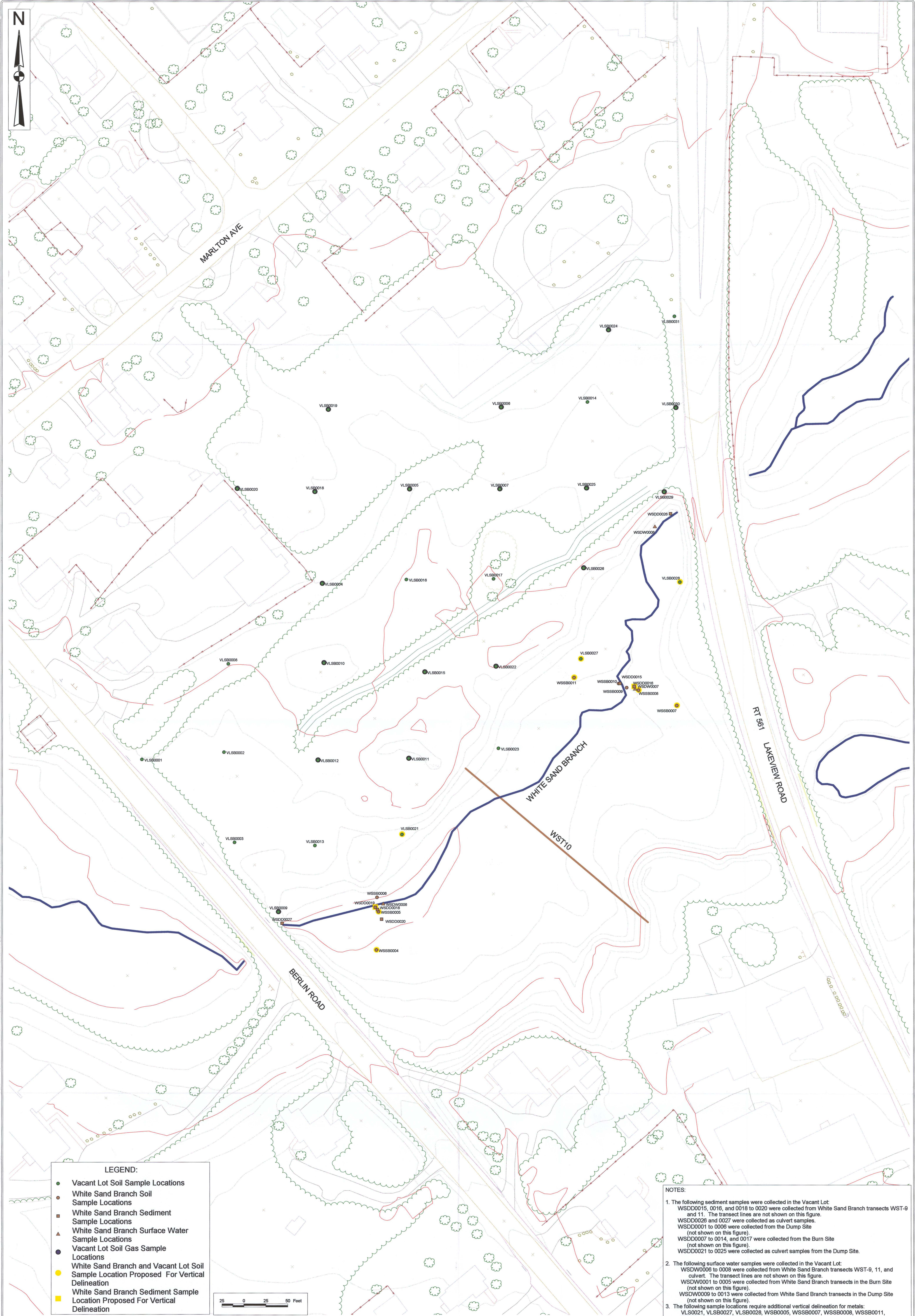
Sincerely,

A handwritten signature in cursive script that reads "Mary Lou Capichioni".

Mary Lou Capichioni
Director, Remediation Services

Enclosure – Figure 5

cc: J. Gerulis, Sherwin-Williams, w/o encl.
A. Danzig, Sherwin-Williams, w/o encl.
J. Josephson, USEPA-Reg.2, w/ encl.
J. Doyon, NJDEP, w/ encl.
H. Martin, ELM, w/ encl.
S. Jones, Weston Solutions, w/ encl.
R. Mattuck, Gradient, w/ encl.
L. Arabia, TtFWI, w/ encl.
S. Peticolas, Esq., Gibbons, Del Deo, Dolan, Griffinger & Vecchione, w/ encl.



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| REPORT DATE: OCTOBER 2006 | PROJECT MANAGER: S. JONES |
| DRAWING: 03742_VL_Proposed_Samples.apr PATH: L:\SHERWIN\GIS\Apr\0506_Vacant_Lot | CHECKED BY: A. FISCHER |
| REVISION NO: 1 | CONTRACT NO. DELIVERY ORDER NO. |
| WORK ORDER NO: 20076.022.077.0005 | DRAWN/MODIFIED BY: J. LYNES DATE CREATED: 05/30/2006 |

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| CLIENT NAME: The Sherwin-Williams Company |
| PROJECT NAME: Sherwin-Williams Gibbsboro Remedial Investigation |

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|--|----------|------------|
| DRAWING TITLE: | | |
| VACANT LOT PROPOSED SAMPLE LOCATION MAP | | |
| FIGURE: | SCALE: | DATE: |
| 5 | 1" = 50' | 10/20/2006 |